

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

4 DONNA CURLING, ET AL., :
5 PLAINTIFFS, :
6 VS. : DOCKET NUMBER
7 BRAD RAFFENSPERGER, ET AL., : 1:17-CV-2989-AT
DEFENDANTS. :
:

TRANSCRIPT OF TELEPHONE CONFERENCE PROCEEDINGS

BEFORE THE HONORABLE AMY TOTENBERG

UNITED STATES DISTRICT JUDGE

SEPTEMBER 9, 2020

8:32 A.M.

MECHANICAL STENOGRAPHY OF PROCEEDINGS AND COMPUTER-AIDED

TRANSCRIPT PRODUCED BY:

OFFICIAL COURT REPORTER

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(SPEAKING ONLY)

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***There were many other counsel present on the phone call but not listed on this appearance page.

PROCEEDINGS

(Atlanta, Fulton County, Georgia; September 9, 2020.)

THE COURT: Good morning, Counsel. Tell me who is there as lead counsel, and I'm not going to go beyond that for now.

MR. CROSS: Good morning, Your Honor. David Cross
for Curling.

MR. BROWN: Bruce Brown for Coalition.

9 MR. TYSON: Good morning, Your Honor. Bryan Tyson
10 for the State defendants. Mr. Russo and Mr. Miller are here as
11 well.

MR. RUSSO: Good morning, Your Honor.

MR. MILLER: Good morning, Your Honor.

14 THE COURT: Good morning.

15 So you-all spoke -- you-all spoke at -- together
16 starting at 8:00 in the morning.

Did you make any progress?

18 MR. CROSS: This is David Cross. Unfortunately not
19 much. It may just help us to walk through the issues where we
20 are.

21 THE COURT: All right. Just a second. I'm just
22 printing one of the lists. Just one second.

(There was a brief pause in the proceedings.)

24 THE COURT: Go ahead.

25 MR. CROSS: So what we had proposed is that each

1 witness would testify only once. And that would mean, for
2 example, if there is a witness that the State is going to call,
3 like one of their own employees, whether they call them as a
4 witness in our case and then have the witness recalled later,
5 the witness would testify only in their case. We would just
6 wait to call the witness for our examination with someone like,
7 say, Mr. Cobb or Mr. Hamilton.

8 But in typical practice that would mean our cross --
9 our examination would not be limited to the scope of their
10 direct. And the same would go the other way. Any witness that
11 they want to examine that we call, we would call that witness
12 once and they would do their cross and whatever they want to
13 cover that is relevant. That way that witness doesn't have to
14 get recalled in their case. We did not have agreement on that.

15 There are two points of disagreement. One, the State
16 is unwilling to agree that cross can exceed the scope of direct
17 even though they do think witnesses should testify once. That
18 would mean anybody who calls a witness could dictate the scope
19 of cross, which anyone gets to do just by having a very short
20 limited direct. We don't think that is fair.

21 The other disagreement is they think the witness
22 shouldn't testify to anything new beyond what is in their
23 declarations. Just as an example given the examination that is
24 going on with the BMDs this week, we don't think that is fair
25 either.

1 MR. TYSON: Your Honor, this is Bryan Tyson. I think
2 maybe we need to start with a more fundamental question, which
3 is we have obviously raised the issue of the -- of there just
4 being argument only and/or if we are going to have witnesses
5 hearing from things that you haven't heard already.

6 And so it might be helpful just to kind of zoom out
7 and start with what we are anticipating in terms of scope and
8 focus of the hearing. And then we can get into some of the
9 minutiae of this because there is obviously going to be a
10 difference in an expert like Dr. Halderman and fact witnesses
11 and those kind of things.

12 So from the State's perspective, I think it may make
13 more sense to start with that global question before we dig
14 down to specifics of how we are handling particular witnesses.

15 THE COURT: That is fine. That is fine. But -- and
16 I have some observations and concerns regarding this as well.
17 I can't say that I have read everything at this point. I have
18 tried to read all of the experts' affidavits last night again
19 so I could get a fix on that and -- and read enough so that
20 I -- though I plan to spend a good portion of today still
21 reading.

22 I think that one of my concerns is this: I have
23 already -- first of all, let me deal with the low-hanging fruit
24 about scope. I have dealt extensively with standing. The
25 State has raised it extensively; has had opportunity to take

1 depositions; has not done so.

2 I'm not willing to spend time on standing at this
3 juncture, having spent such an inordinate amount of time, in
4 fact, on standing issues and recently, not just a year ago or
5 two years ago.

6 So I don't think that the calling -- the State's
7 calling of individuals for purposes of reviewing standing is a
8 good use of the Court's time. You are welcome to do this on
9 your own time later. But it is not going to be productive.

10 So to the extent that that is -- I'm not addressing
11 it in terms of being abusive or anything else that might be
12 raised in the context of the motion for protective order. It
13 is just the inherent authority of the Court to control this
14 proceeding. Which having still not endless time and which I
15 need to move promptly, it does not make sense. So let me just
16 try -- that is Number 1 in terms of the time and the witnesses
17 listed by the State.

18 Now, one of the issues that I think that is of some
19 concern is -- you know, I have a number of experts here listed
20 by both parties. And to the extent I'm allowing expert
21 testimony at this juncture, you know, I would hope it to be
22 productive as well or at least helpful for me to understand --
23 be able to ask some questions.

24 There are two issues for me at the moment. One is
25 that a substantial portion of some of these experts' testimony

1 may be deemed -- has been at least for now classified by
2 defendants as super confidential. And so I'm not clear
3 relative to the testimony that would be in open court how that
4 would be handled and would we have to reserve all of those
5 individuals and their testimony to, you know, a discrete part
6 of the hearing and cease the public of hearing for that portion
7 of the testimony because it is so interwoven and then go on to
8 a different number. I mean, it is somewhat awkward I have to
9 say. So that is one issue.

10 And it is not clear to me in terms of the examination
11 of the defendants' expert witnesses what -- at this juncture
12 what the -- whether the plaintiffs are seeking to have
13 extensive opportunity to do an examination and what you are
14 thinking.

15 I will say that just in terms of again something that
16 is productive under the framework that I have identified for
17 the hearing is, one, I guess I still reject the notion that it
18 is going to be helpful to the Court at this juncture -- I'm not
19 going to agree to be subject -- to have just oral argument. At
20 the same time, there clearly are some conflicts in the evidence
21 at this juncture that would be very difficult for the Court to
22 resolve regarding the BMD data system issues.

23 And they certainly are potentially resolvable, and it
24 is certainly so that plaintiffs' experts have only -- are just
25 really beginning to be able to look into the function -- the

1 internal functionality of the system -- by a computer -- a BMD
2 for its usage. And so something might emerge as of Thursday.

3 But -- and it is not that there is a problem with it
4 emerging as of Thursday at this point because the defendants
5 can obviously have their experts listen. But I just think that
6 it is -- as much as that particular -- those particular issues
7 are sufficiently contested, it seems to me that it would still
8 be at this juncture very challenging for the Court to make the
9 findings necessary for a preliminary injunction.

10 Yes, it could educate me. But I could have more
11 supplemental information as well to do that if you are really
12 at this -- if it is all -- basically great difficulties emerge
13 that are just -- that are basically -- that either give rise to
14 the need for me to hear more about this come -- come the
15 election and after the election or, on the other hand, just
16 simply that the record can be obviously supplemented as
17 Dr. Halderman and the plaintiffs do more work on what has been
18 accessible to them.

19 But I am concerned about this because it is a very
20 unwieldy circumstance to have the public hearing and at the
21 same time be stuck on matters that, you know, normally if we
22 had more time we would really try to figure out how more
23 effectively to segregate that testimony and how would that be
24 done and how would that be done also with the party itself not
25 being able even to sit in there if the attorneys' eyes only

1 determination holds. And I haven't had enough time to go
2 through each of those issues or the attorneys to raise -- and
3 we're still basically sorting through those issues.

4 But what I can see is that there are certainly
5 considerable conflict about these. Now, on the other hand,
6 I'm -- I think the issues as to the Poll Pads are straight --
7 are lots more straightforward in those concerns and something
8 that I could -- the Court could address and -- potentially or
9 also be -- have a clear idea of why -- of the State's position
10 than I do at this juncture.

11 So -- and there may be some other areas like that
12 that it absolutely will be useful right now and not as awkward.
13 So those are my general thoughts and concerns. And --

14 MR. CROSS: Your Honor, this is David Cross. On the
15 AEO issue, we should be able to manage that as we have in the
16 past. Your Honor may recall last summer the Fortalice reports
17 were a big focus of this hearing. Those were designated AEO --
18 certainly confidential and I think AEO. And we were able to
19 navigate that, as I recall, without having to publicly disclose
20 things that the State was concerned about. And I envision
21 being able to do that again here.

22 I think on those types of issues we don't have to get
23 explicit for the examinations we want to conduct. I think we
24 can do it as we did in the past.

25 We do anticipate there will be a lot of discussion of

1 the examination that we have done. We expect there will
2 probably be a demonstration. They are still working on their
3 analysis. But, you know, we did that with the DREs, and that
4 was all in open court as well.

5 So notwithstanding the scope of the confidentiality
6 designations, we have navigated that. And I don't think it is
7 going to be a problem here as it was not in the past.

8 MR. BROWN: Your Honor, this is Bruce Brown. In
9 terms of the Coalition's experts -- and I would agree with
10 Mr. Cross on that -- we have Dr. Stark and Harri Hursti and
11 Kevin Skoglund. Neither Stark nor Hursti will rely on any
12 confidential information in their testimony. Skoglund might.
13 But, again, there may be ways for us to navigate around that by
14 the way we couch the testimony and not cover things that have
15 already been covered under seal.

16 MR. TYSON: Your Honor, this is Bryan Tyson for the
17 State defendants. I believe the only document that we filed
18 under seal was the testimony of Mr. Hamilton regarding kind of
19 what has been done kind of on the specific topic of the
20 Fortalice reports. So I don't believe anything else for the
21 State has been filed under seal.

22 Mr. Cross has mentioned a demonstration of the
23 system. I think, again, one of the challenges we're going to
24 have is this is being done over Zoom. So it is going to be a
25 little bit more limited access for our expert to figure out

1 what is going on with the demonstration. So I'm just trying to
2 balance all those different interests. I recognize -- I think
3 Your Honor is correct there are some things that will be
4 helpful for you to hear from people on. And maybe a division
5 by topic makes more sense to cover. For example, there's
6 discussions of audit. There are discussions of Poll Pads.
7 There's discussions of scanner thresholds. There's discussions
8 of BMDs, discussions of kind of general cyber principles.

9 Each of those is really kind of right now a distinct
10 area. And at least for the plaintiffs -- I mean, we are kind
11 of at a point where they are asking for relief in all those
12 different areas. And it may make sense to take those areas one
13 at a time by topic instead of trying to do something like a
14 more typical hearing.

15 But, again, I think it comes down to what do you need
16 to hear from as opposed to us just putting up a bunch of people
17 that are giving you information that is not really relevant for
18 the decisions that you need to make.

19 MR. CROSS: Your Honor, this is David Cross. I don't
20 think we can organize by topic because you are going to have
21 witnesses that cover multiple topics. So you would have to
22 recall witnesses. And I think we would like to avoid that.

23 And from my perspective, Your Honor has been very
24 adept in the past, as any judge is, to help people move on. We
25 certainly are not looking to waste time. Our witnesses for

1 Curling plaintiffs are going to focus principally on the
2 cybersecurity issues. I think Your Honor is going to be very
3 surprised and unsettled on what you are going to see.

4 We're going to talk feasibility a bit because the
5 presentation from the defense and the papers on this being a
6 big change and a heavy lift is not accurate. We will certainly
7 touch on that.

8 Then we will talk about the audits. But I think it
9 has always worked well in the past as in any trial to set time
10 limits. We call our witnesses. And if it is not helpful, you
11 tell us to move on.

12 THE COURT: The witnesses that the plaintiffs have
13 identified to call, have you made arrangements for their
14 availability?

15 MR. CROSS: Yes, Your Honor. For our own witnesses,
16 we have worked that out. We're doing testing today on the
17 Zoomgov platform both with the court and separately on our own
18 just to make sure everyone that we are going to put up and all
19 of our lawyers are comfortable with that platform.

20 By the way, Your Honor, we also have a trial vendor
21 that has their own license to the Zoomgov. They will be
22 supporting us in the background. So we will have some
23 additional resources on our end just to make sure everything
24 works.

25 To the witnesses we would call that are defense

1 witnesses, again where we left that was, even though there are
2 some defense witnesses we would call in our own case, we are
3 perfectly happy to just leave those for when the defense calls
4 them, as long as the defense is committed to calling them.

5 We don't want to have a situation where we rest and
6 then they say, well, we decided not to call witnesses that we
7 would have called ourselves. As long as they are committing to
8 calling those overlap witnesses, we'll let them wait until
9 their case. They do whatever examination they are doing.
10 We'll do whatever examination we are going to do. And the
11 witness is on and off the stand once.

12 So if we have a commitment from them that they are
13 going to present those people, then I think all the witnesses
14 we have confirmed availability across the two days.

15 THE COURT: What I'm saying is, for instance, Mr. --
16 Dr. Juan Gilbert, have you made arrangements with the defendant
17 to have him available?

18 MR. CROSS: Yes. Both sides have discussed -- well,
19 I mean, this is my understanding. Mr. Tyson will tell me if
20 I've got it wrong.

21 We have discussed -- subpoenas were served by our
22 group. And my understanding is that all of these people will
23 appear to the extent either side is calling them.

24 MR. TYSON: Your Honor, this is Bryan Tyson. I think
25 the one issue that might be outstanding on the witness list is

1 Dr. Coomer from Dominion. I believe the plaintiffs had served
2 a 30(b)(6) notice on Dominion that they withdrew. And we have
3 not decided yet whether we are calling Dr. Coomer. We would --
4 so I think that's the one that may not be covered by what
5 Mr. Cross has described here.

6 MR. MILLER: Your Honor, if I may, this is Carey
7 Miller. Specific to Dr. Gilbert, I just wanted to -- we really
8 haven't had any detailed conversations in terms of
9 availability. Dr. Gilbert was served with a subpoena this
10 morning.

11 I think after speaking with him yesterday, there are
12 going to be some restrictions kind of on his time availability
13 just due to his responsibility in teaching his graduate
14 students.

15 I'm sure we can work those things out. But that is
16 kind of the one thing I wanted to flag in terms of his time
17 frame for availability.

18 THE COURT: Well, please do as to any of the people
19 who are affiliated with the State. Will you please identify
20 what their -- talk with counsel and really -- just as an easy
21 thing right now, if you know it, basically go ahead and send
22 them a note indicating what the time -- whatever periods of
23 time each of these witnesses might not be available.

24 I have -- I think the State -- and maybe I missed
25 it -- failed to provide me with the requisite notice of the

1 September 10, 2020, hearing in connection with -- more
2 importantly the proposed rule for auditing, which my
3 August 2019 order required.

4 But at this point, that is neither here nor there. I
5 mean, I think it is attached as one of the -- as an exhibit now
6 to one of the plaintiffs' filings.

7 But are there any individuals who have to be present
8 at that hearing? I mean --

9 MR. TYSON: I'm sorry, Your Honor. This is Bryan
10 Tyson. I may not have understood your question. I believe we
11 have filed the audit rules on the 21st of August.

12 THE COURT: Maybe you did, and I didn't see it.

13 MR. TYSON: But what was the question about a witness
14 relating to that? I apologize.

15 THE COURT: The hearing in front of the State Board
16 is at 9:00 A.M. So I'm assuming it will be through, that there
17 will be no conflicts because of that.

18 Is that a fair assumption?

19 MR. TYSON: Yes, Your Honor. I'm sorry. You are
20 referring to the State Election Board meeting tomorrow, yes. I
21 don't believe we are going to have anybody who has a conflict
22 for that because I believe that meeting will be complete by the
23 time we get to our hearing.

24 THE COURT: All right. So at this juncture, you-all
25 don't agree about consolidating witnesses in the way that

1 Mr. Cross has proposed.

2 Let me just say this is what I'll -- I think it would
3 be better to have individuals up once. But I think I've
4 allowed enough time if people are really moving through the
5 witnesses as anticipated to -- you know, to allow a more
6 traditional structure.

7 But if I don't think it is being productive, I'm
8 going to just change course. And I mean -- and just -- I mean,
9 I have authority to do -- to manage this as I see fit because
10 it would be -- and I'll see how far this -- how much this
11 works.

12 But I know that the plaintiffs have said, oh, you are
13 going to be surprised at how easy the transition is. And I
14 might be. But there still are significant issues as you-all --
15 the plaintiffs are aware about changing at this late moment.

16 There are things that are not so significant. And I
17 just -- I urge you to keep this in mind that if you are
18 giving -- providing a foundation for the future, you know, and
19 all are aware that this is what we're walking into, that is one
20 thing.

21 But I don't -- I don't want to waste time at this
22 juncture. So it is hard for me to conceive exactly of how a
23 transition to an entire new system at this moment is going to
24 work but -- or would be -- under the current record if I did a
25 wholesale change.

1 But I've allowed you to present the hearing and go
2 forward because of the fact that there may be things that can
3 be done to at least secure the vote from the plaintiffs'
4 perspective that will be reassuring to the public rather than
5 something else.

6 And these are serious issues that have been raised.
7 But to the extent that -- again, that we end up in a war of
8 experts about some of these issues, it would be very tough to
9 resolve on -- this week.

10 So it is just a reiteration of my concerns identified
11 before. But there are issues that I would like to talk about
12 further that I think that there are -- that there is a reason
13 to say, listen, a remedy right now can be implemented
14 potentially to address this issue.

15 MR. CROSS: Your Honor, this is David Cross. I'm
16 sorry.

17 THE COURT: Go ahead.

18 MR. CROSS: I was just going to say, just maybe to
19 ease your mind a bit, what we will be presenting and asking for
20 in the hearing is not going to be a wholesale change to a new
21 system. We'll explain that, and we'll walk through that as to
22 why.

23 I think the witnesses will be really helpful because
24 I think what we are going to be focused on is going to be
25 something far short of that.

1 We understand Your Honor's concerns.

2 THE COURT: Just one second. I'm sorry.

3 **(There was a brief pause in the proceedings.)**

4 THE COURT: All right. So we're just moving forward
5 as you have set forth here. I have already ruled about the
6 question of the defendants calling the plaintiffs or their
7 representatives as to standing issues and ruled that that would
8 not at this point be productive or useful. And so I'm not
9 going to allow you to proceed in that way.

10 And if we end up with any sort of the confidentiality
11 issues, then you are going to have to flag them for me so we
12 can separately deal with them and potentially do them at a
13 separate hearing at the end.

14 And I have -- while I don't know what is on the
15 docket at this point, I did look at the background just by
16 looking at the web of the individual -- the nonparty-related
17 individual that -- Susan Greenhalgh that the Curling -- I'm
18 sorry -- the Coalition plaintiffs referenced.

19 And she appears to have specialized skills and not to
20 be a party representative. So that if the Coalition wishes to
21 secure her consulting services and have her sign -- I assume
22 she already has signed the confidentiality agreement -- you can
23 use her. But you would have to really, Mr. Brown, go over in
24 great detail what her obligations are relative to communicating
25 with other people that she knows.

1 MR. BROWN: Yes, Your Honor.

2 THE COURT: I put this on you.

3 MR. BROWN: Yes, Your Honor.

4 THE COURT: So we're going to begin at 1:00. And is
5 there anything else that we need to address at this juncture?

6 MR. RUSSO: Your Honor, this is Vincent Russo. I
7 believe the plaintiffs also submitted some information on
8 Ms. Rhonda Martin yesterday as a consultant.

9 Was there a decision on her?

10 THE COURT: I'm sorry. I don't have anything --
11 anything else. And Ms. Martin is a named plaintiff. So I
12 don't have anything else that would distinguish her from
13 Ms. Marks at this time.

14 MR. RUSSO: Thank you, Your Honor.

15 MR. BROWN: For your information --

16 THE COURT: I mean, I see the last docket entry is
17 Ms. Martin and -- I'm sorry -- and, obviously, she has -- there
18 is no question that she has extensive skills. But I don't know
19 how to distinguish her as a party at this juncture.

20 So go ahead, Mr. Brown.

21 MR. BROWN: No. I was just going to say that, as you
22 know, she obviously has the qualifications in terms of who she
23 is. She's not a named plaintiff. She is a director of the
24 Coalition, an employee of the Coalition. So she would -- we
25 would argue she has the independence necessary under my

1 direction to follow the terms of the protective order with
2 respect to attorneys' eyes only and more important that there
3 is no damage to the defendants for having the AEO material
4 available to her, which is the question on the AEO is what
5 damage is it to give it to either Ms. Greenhalgh or Ms. Martin
6 or for that matter Ms. Marks, as opposed to confidential
7 information which they would be authorized to view.

8 THE COURT: The only -- is there anything further
9 that counsel for the State wishes to say?

10 You addressed this issue as to Ms. Marks in your
11 papers. You didn't really address anything related to
12 Ms. Martin other than generically.

13 MR. RUSSO: Sure. Your Honor, this is Vincent Russo.
14 I mean, if there is something that the plaintiffs believe
15 should be marked confidential that is marked AEO, I think that
16 is -- you know, there is a process for us to go through to
17 discuss that and we can try to work that out and, if we're not
18 able to, bring it back to you.

19 Otherwise I don't think she is any different than
20 Ms. Marks or any other named plaintiffs. And if we're going to
21 allow, you know, the plaintiffs to be able to look at AEO --
22 the documents that are marked AEO, I think that makes the
23 designation pointless.

24 THE COURT: All right. Well, where are we on getting
25 identification of all the AEO documents to the plaintiffs?

1 MR. BROWN: Your Honor, last night we received a list
2 of the AEO documents. And part of the difficulty is the
3 limitations on reviewing those -- that is me and Mr. McGuire
4 for the Coalition -- to be able to review those to challenge
5 them.

6 They are almost uniformly user manuals and documents
7 relating to the Dominion product. Many of the documents have
8 been produced by Dominion. Many of the documents we have been
9 able to determine are actually on the internet already or were
10 produced by Dominion.

11 THE COURT: All right. If they are on the internet
12 already, you obviously should be able to resolve the question
13 of their confidentiality or AEO. I mean, to me, that is where
14 you should start this morning and -- so that you can resolve
15 these issues.

16 And I can't -- you know, anything that is generally
17 available and accessible publicly or to representatives of the
18 State who are -- who are engaging in RFP processes, come on.
19 Those need to just be cleaned up.

20 So I would say do that all -- get that all done this
21 morning so that you can -- also that you can just -- your folks
22 can help you review those and any other similar -- any other
23 documents that would fall under that.

24 MR. BROWN: Yes, Your Honor.

25 THE COURT: And I think a lot of this will be taken

1 care of. And then obviously somebody else can also -- by my
2 ruling can assist in anything else. And obviously still the
3 plaintiffs are going to be looking at the same stuff. I don't
4 think I have left you without a -- without a true team. So --

5 MR. BROWN: Thank you, Your Honor.

6 THE COURT: All right. Well, I'm going to close out
7 now. And hopefully we won't have to have an emergency call
8 today. We have some time tomorrow to work out some things too.

9 MR. CROSS: Your Honor, this is David Cross. Could I
10 ask one question as a suggestion for tomorrow?

11 THE COURT: Yes.

12 MR. CROSS: One other thing we had thought would be
13 useful to the Court was very brief opening statements.
14 Literally like a few minutes where we can just say, Your Honor,
15 this is what the key points --

16 THE COURT: That is fine. That is fine. Do you
17 think five minutes, ten minutes?

18 MR. CROSS: Okay. Thank you.

19 THE COURT: What are you saying? Five or ten?

20 MR. CROSS: I'm sorry. We were saying ten minutes a
21 side. So five minutes for each group.

22 THE COURT: All right. That is fine.

23 MR. TYSON: Your Honor, this is Bryan Tyson. One
24 last point is that the audit rules were filed at Docket Number
25 793, just so that you have that.

1 THE COURT: Okay. All right. I need to leave. So I
2 know you are --

3 MR. BROWN: Thank you, Your Honor.

4 MR. CROSS: Thank you, Your Honor.

5 MR. TYSON: Thank you.

6 **(The proceedings were thereby concluded at 9:09**

7 **A.M.)**

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1 C E R T I F I C A T E
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3 UNITED STATES OF AMERICA
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5 NORTHERN DISTRICT OF GEORGIA
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7 I, SHANNON R. WELCH, RMR, CRR, Official Court Reporter of
8 the United States District Court, for the Northern District of
9 Georgia, Atlanta Division, do hereby certify that the foregoing
10 23 pages constitute a true transcript of proceedings had before
11 the said Court, held in the City of Atlanta, Georgia, in the
matter therein stated.

12 In testimony whereof, I hereunto set my hand on this, the
13 9th day of September, 2020.

14
15
16
17 *Shannon R. Welch*
18 SHANNON R. WELCH, RMR, CRR
19 OFFICIAL COURT REPORTER
20 UNITED STATES DISTRICT COURT
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